

Creed Energy Center, LLC

6150 Creed Road
Suisun City, CA 94585

May 30, 2017

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105
Attn: Title V

**Subject: Creed Energy Center, LLC
Title V Semi-Annual Monitoring Report
Facility # B4414
Reporting Period: November 1, 2016 – April 30, 2017**

To Whom It May Concern:

Enclosed is the Title V CEMS Semi-Annual Monitoring Report for the Creed Energy Center ("CEC") for the reporting period from November 1, 2016 – April 30, 2017.

CEC is currently in compliance with the District CEMS regulations. CEC maintained compliance with the monitoring requirements listed in the Title V permit for CEC during this reporting period.

By signing this report I am certifying that based on information and belief formed after reasonable inquiry, the statements and information in the attached report are true, accurate, and complete.

If you have any questions or require additional information, please contact me at (707) 399-4393.

Sincerely,



Andrew Gundershaug
Plant Manager and Designated Representative/Responsible Official

Table VII – A
Applicable Limits and Compliance Monitoring Requirements
S-1 – COMBUSTION GAS TURBINE
November 1, 2016 through April 30, 2017

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|---------------|--------------------------------------|--------|-----------------------|--|--|------------------------------|-----------------|------------|----|
| | | | | | | | | Yes | No |
| NOx | BAAQMD 9-9-301.1.3 | N | | 9 ppmv @ 15% O ₂ , dry | BAAQMD 9-9-501 and BAAQMD condition #20136, part 23c | C | CEM | X | |
| NOx | BAAQMD 9-9-301.1.3 | N | | 9 ppmv @ 15% O ₂ , dry | BAAQMD condition #20136, part 24a | P/A | Source Test | X | |
| NOx | BAAQMD 9-9-301.1.2 | N | | .43 lbs/MWhr or 9 ppmv @ 15% O ₂ , dry | BAAQMD 9-9-501 and BAAQMD condition #19684, part 23c | C | CEM | X | |
| NOx | SIP Regulation 9-9-301.3 | Y | | 9ppmv @ 15% O ₂ , dry | SIP Regulation 9-9-501 and BAAQMD condition #19684, part 23c | C | CEM | X | |
| NOx | SIP Regulation 9-9-301.3 | Y | | 9ppmv @ 15% O ₂ , dry | BAAQMD condition #19684, part 24a | P/A | Source Test | X | |
| NOx | NSPS, Subpart GG 40 CFR 60.332(a)(1) | Y | | 75ppmv @ 15% O ₂ , dry | NSPS 40CFR 60.334(c) | C | CEM | X | |
| NOx | None | Y | | None | 40 CFR 75.10 | C | CEM | X | |
| NOx | BAAQMD condition #20136, part 18.1 | Y | | 2.5 ppm @15% O ₂ , dry 3-hr rolling average except during turbine startup or shutdown | BAAQMD condition #20136, part 18.1 | C | CEM | X | |
| NOx | BAAQMD condition #20136, part 18.1 | Y | | 2.5 ppm @15% O ₂ , dry, 3-hr average except during turbine startup or shutdown | BAAQMD condition #20136, part 24a | P/A | Source Test | X | |

Facility Name: Creed Energy Center
Permit for Facility #: B4414

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|-----------------|------------------------------------|--------|-----------------------|--|---|------------------------------|--|------------|----|
| | | | | | | | | Yes | No |
| NOx | BAAQMD condition #20136, part 21 | Y | | 121 lb/ day (as NO ₂) | BAAQMD condition #20136, part 23c | C | CEM | X | |
| NOx | BAAQMD condition #20136, part 21 | Y | | 16.4 tons per year (as NO ₂) | BAAQMD condition #20136, part 23c | C | CEM | X | |
| CO | BAAQMD condition #20136, part 18.3 | Y | | 6 ppmv, @ 15% O ₂ , dry, 3-hr average except during turbine startup or shutdown | BAAQMD condition #20136, parts 18.3 and 23c | C | CEM | X | |
| CO | BAAQMD condition #20136, part 18.3 | Y | | 6 ppmv, @ 15% O ₂ , dry, 3-hr average except during turbine startup or shutdown | BAAQMD condition #20136, part 24c | P/A | Source Test | X | |
| CO | BAAQMD condition #20136, part 21 | Y | | 163 lb/ day | BAAQMD condition #20136, part 23c | C | CEM | X | |
| CO | BAAQMD condition #20136, part 21 | Y | | 29.1 tons per year | BAAQMD condition #20136, part 23c | C | CEM | X | |
| CO ₂ | | Y | | None | 40 CFR 75.10 | C | CEM (CO ₂) or CEM (O ₂) or fuel flow monitor | X | |
| SO ₂ | BAAQMD 9-1-301 | Y | | GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours | | N | | X | |
| SO ₂ | BAAQMD 9-1-302 | Y | | 300 ppm (dry) | BAAQMD condition #20136, part 23f | N | | X | |

Facility Name: Creed Energy Center
Permit for Facility #: B4414

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|------------------------|------------------------------------|--------|-----------------------|--|---|------------------------------|---------------------------------|------------|----|
| | | | | | | | | Yes | No |
| SO2 | NSPS 40 CFR Subpart GG 60.333(a) | Y | | 0.015% (vol) @ 15% O ₂ (dry) | NSPS 40 CFR 60.334(h)(3) | NN | None | X | |
| SO2 | None | Y | | None | 40 CFR 75.11(d)(2), 40 CFR 75, Appendix D, part 2.3 | | Fuel measurements, calculations | X | |
| SO2 | BAAQMD condition #20136, part 18.6 | Y | | 1.39 lb/hr excluding startup and shutdown of turbines | BAAQMD condition #20136, part 23e | P/Q | Total sulfur content analysis | X | |
| SO2 | BAAQMD condition #20136, part 18.6 | Y | | 1.39 lb/hr excluding startup and shutdown of the turbines | BAAQMD condition #20136, part 24f | P/A | Source test | X | |
| SO2 | BAAQMD condition #20136, part 21 | Y | | 33 lb/ day | BAAQMD condition #20136, part 23e | P/Q | Total sulfur content analysis | X | |
| SO2 | BAAQMD condition #20136, part 21 | Y | | 6.0 tons/year | BAAQMD condition #20136, part 23e | P/Q | Total sulfur content analysis | X | |
| Opacity | BAAQMD 6-1-301 | N | | > Ringelmann No.1 for no more than 3 minutes in any hour | | N | | X | |
| Opacity | SIP 6-301 | Y | | > Ringelmann No.1 for no more than 3 minutes in any hour | | N | | X | |
| Opacity | BAAQMD condition #20136, part 17 | Y | | > Ringelmann No.1 for no more than 3 minutes in any hour or equivalent 20% opacity | | N | | X | |
| Filterable Particulate | BAAQMD 6-1-310 | Y | | 0.15 grains/dscf | | N | | X | |

Facility Name: Creed Energy Center
Permit for Facility #: B4414

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|------------------------|------------------------------------|--------|-----------------------|--|--|------------------------------|--|------------|----|
| | | | | | | | | Yes | No |
| Filterable Particulate | SIP 6-310 | Y | | 0.15 grains/dscf | | N | | X | |
| PM10 | BAAQMD condition #20136, part 18.5 | Y | | 3 lb/hr for S-1 | BAAQMD condition #20136, part 24e | P/A | Source Test | X | |
| PM10 | BAAQMD condition #20136, part 21 | Y | | 72 lb/day | BAAQMD condition #20136, parts 24e | P/A | Source Test | X | |
| PM10 | BAAQMD condition #20136, part 21 | Y | | 13.1 tons/year | BAAQMD condition #20136, part 24e | P/A | Source Test | X | |
| POC | BAAQMD condition #20136, part 18.4 | Y | | 2 ppmv @ 15% O ₂ , dry, except during turbine startup or shutdown | BAAQMD condition #20136, part 24d | P/A | Source Test | X | |
| POC | BAAQMD condition #20136, part 21 | Y | | 30.0 lb/calendar day | BAAQMD condition #20136, part 24d | P/A | Source Test | X | |
| POC | BAAQMD condition #20136, part 21 | Y | | 4.9 ton/year | BAAQMD condition #20136, part 24d | P/A | Source Test | X | |
| NH ₃ | BAAQMD condition #20136, part 18.2 | N | | 10ppmv @15% O ₂ , dry, except during turbine startup or shutdown | BAAQMD condition #20136 parts 18.2 and 23b | C | District approved correct ammonia slip calculation and correction factor determined by source test | X | |
| NH ₃ | BAAQMD condition #20136, part 18.2 | N | | 10ppmv @15% O ₂ , dry, except during turbine startup or shutdown | BAAQMD condition #20136, part 24b | P/A | Source Test | X | |

Facility Name: Creed Energy Center
Permit for Facility #: B4414

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|-------------------------|----------------------------------|--------|-----------------------|----------------------------------|-----------------------------------|------------------------------|---------------------------|------------|----|
| | | | | | | | | Yes | No |
| Heat input limit | BAAQMD condition #20136, part 22 | Y | | 500 MMBTU/hr (HHV), 3-hr average | BAAQMD condition #20136, part 23d | C | Fuel meter, | X | |
| Heat input limit | BAAQMD condition #20136, part 22 | Y | | 500 MMBTU/hr (HHV), 3-hr average | BAAQMD condition #20136, part 23d | P/M | Fuel composition analysis | X | |
| Heat input limit | BAAQMD condition #20136, part 22 | Y | | 500 MMBTU/hr (HHV), 3-hr average | BAAQMD condition #20136, part 24g | P/A | Source test | X | |
| Heat input limit | BAAQMD condition #20136, part 22 | Y | | 12,000 MMBTU/day (HHV) | BAAQMD condition #20136, part 23d | C | Fuel meter, calculations | X | |
| Heat input limit | BAAQMD condition #20136, part 22 | Y | | 12,000 MMBTU/day (HHV) | BAAQMD condition #20136, part 31g | P/Q | Fuel composition analysis | X | |
| Heat input limit | BAAQMD condition #20136, part 22 | Y | | 4,380,000 MMBTU/yr (HHV) | BAAQMD condition #20136, part 23d | C | Fuel meter, calculations | X | |
| Heat input limit | BAAQMD condition #20136, part 22 | Y | | 4,380,000 MMBTU/yr (HHV) | BAAQMD condition #20136, part 31g | P/Q | Fuel composition analysis | X | |
| MW | N/A | | | None | BAAQMD condition #20136, part 24h | P/A | Source test | X | |
| Exhaust Gas temperature | N/A | | | None | BAAQMD condition #20136, part 24j | P/A | Source test | X | |
| Stack gas flow | N/A | | | None | BAAQMD condition #20136, part 24i | P/A | Source test | X | |

Facility Name: Creed Energy Center
Permit for Facility #: B4414

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|---------------------|----------------------------------|--------|-----------------------|---|-------------------------------------|------------------------------|---|------------|----|
| | | | | | | | | Yes | No |
| NH3 injection rate | N/A | | | None | BAAQMD condition #20136, part 24k | P/A | Source test District approved correct ammonia slip calculation and correction factor determined by source test | X | |
| Start-up Period | BAAQMD condition #20136 part 19 | | | 60 minutes per start-up | BAAQMD condition #20057, part 32(b) | P/E | Records | X | |
| Shut-down period | BAAQMD condition #20136, part 20 | | | 30 minutes per shutdown | BAAQMD condition #20057, part 31(b) | P/E | Records | X | |
| Fuel Sulfur Content | 40 CFR 60.333(b) | Y | | 0.8 percent by weight (8000ppmw) sulfur | 40 CRFR 60.334(h)(1) | P | Fuel Sulfur Content Testing | X | |

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S-2 – DIESEL FIREWATER PUMP

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|--------------------|--|--------|-----------------------|---|---|------------------------------|------------------------------|------------|----|
| | | | | | | | | Yes | No |
| SO ₂ | BAAQMD 9-1-301 BAAQMD | N | | GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours | | P/E | Fuel certification by vendor | X | |
| | BAAQMD 9-1-304 | Y | | Sulfur content of fuel <0.5% by weight | | P/E | Fuel certification by vendor | X | |
| Opacity | BAAQMD Regulation 6-1-302 | N | | <Ringelman No 2 more than 3 min/hr | | N | | X | |
| Opacity | SIP Regulation 6-1-302 | Y | | <Ringelman No 2 for more than 3 min/hr | | N | | X | |
| FP | BAAQMD Regulation 6-1-310 | N | | 0.15 grain/dscf | | N | | X | |
| FP | SIP Regulation 6-310 | Y | | 0.15 grain/dscf | | N | | X | |
| Hours of operation | BAAQMD 9-8-330.1 BAAQMD Condition #22850 Part 1 | Y | | Emergency use for an unlimited number of hours | BAAQMD 9-8-530 BAAQMD Condition #22850 Part 3 | C P/E | Hour meter, recordkeeping | X | |
| Hours of operation | BAAQMD 9-8-330.2 BAAQMD Condition #22850 Part 1 | Y | | Reliability-related activities not to exceed 100 hours in any consecutive 12-month period | BAAQMD Regulation 9-8-530 BAAQMD Condition #22850 Part 3 | C P/E | Hour meter, recordkeeping | X | |

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S-3 – COOLING TOWER

| Type of Limit | Citation of Limit | FE Y/N | Future Effective Date | Limit | Monitoring Requirement Citation | Monitoring Frequency (P/C/N) | Monitoring Type | Compliance | |
|--------------------|---------------------------|--------|-----------------------|---|---------------------------------|------------------------------|-----------------|------------|----|
| | | | | | | | | Yes | No |
| Opacity | BAAQMD Regulation 6-1-301 | N | | <Ringelmann No 1 for more than 3 min/hr | N | N | | X | |
| Opacity | SIP Regulation 6-301 | Y | | <Ringelmann 1 for more than 3 min/hr | N | N | | X | |
| Particulate Weight | BAAQMD Regulation 6-1-310 | N | | 0.15 grains per dscf | N | N | | X | |
| Particulate Weight | SIP Regulation 6-301 | Y | | 0.15 grains per dscf | Y | N | | X | |
| Particulate Weight | BAAQMD Regulation 6-1-311 | Y | | 40 lb/hr | N | N | | X | |
| Particulate Weight | SIP Regulation 6-311 | Y | | 40 lb/hr | N | N | | X | |